

Robert C. Patrick  
Regional Administrator  
Federal Transit Administration  
Region 6  
819 Taylor Street  
Room 8A36  
Fort Worth, TX 76102

Dear Mr. Patrick:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, Environmental Protection Agency (EPA) Region 6 has reviewed the Draft Environmental Impact Statement (DEIS) for the construction and operation of the University Corridor Fixed Guideway proposed by the Metropolitan Transit Authority of Harris County, Texas (METRO). METRO proposes to implement transit improvements which include a fixed guideway project to improve transit service in the University Corridor of Houston, Texas.

EPA rates the DEIS as "LO," i.e., EPA has "Lack of Objections" to the proposed Federal action. We have enclosed some comments for consideration which we believe will strengthen the NEPA document. Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act to inform the public of our views on this proposed Federal action. If you have any questions, please contact Mike Jansky of my staff at (214) 665-7451 or [jansky.michael@epa.gov](mailto:jansky.michael@epa.gov), for assistance.

EPA appreciates the opportunity to review the DEIS. Please mail two (2) copies of the Final EIS when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Federal Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 20004.

Sincerely yours,

Cathy Gilmore, Chief  
Office of Planning and  
Coordination (6EN-XP)

Enclosure

**COMMENTS**  
**METRO FIXED GUIDEWAY**  
**UNIVERSITY CORRIDOR**  
**DRAFT ENVIRONMENTAL IMPACT STATEMENT**  
**FEDERAL TRANSIT ADMINISTRATION**  
**US DEPARTMENT OF TRANSPORTATION**

1. Table 4-4, page 4-16: The ozone National Ambient Air Quality Standards (NAAQS) is listed as 85 parts per billion (ppb), and although the monitored data is often reported in ppb, the actual ozone standard is 0.08 parts per million (ppm). We suggest changing the table in the Final EIS to reflect the actual standard.
2. Table 4-4, page 4-16: The Particulate Matter (PM)<sub>2.5</sub> annual and 24-hour standards are in error and should be corrected. The correct PM<sub>2.5</sub> annual standard is 15 micro grams per cubic meter (ug/m<sup>3</sup>). The correct PM<sub>2.5</sub> 24-hour standard is 65 ug/m<sup>3</sup>. Please correct in the Final EIS.
3. Section 4.6.2, page 4-18: MOBILE6.2 is EPA's emission factor model, not HGAC's. This should be corrected in the text. Please correct in the Final EIS.
4. Pages 4-17 and 4-21 thoroughly address air quality impacts and conformity. The DEIS states that a portion of this project (Wheeler Station to the UH-Central Campus) is under review to insure that they are conforming to the Regional Transportation Plan/ (RTP)/Transportation Improvement Program. Although it is clearly stated in the EIS that this portion is expected to be included in the 2035 RTP and a conformity determination is scheduled for approval this year, this portion of the project can not be funded until the Transportation Plan is found by the Federal Highway Administration to be in conformity with the State Implementation Plan (SIP). Please acknowledge in the Final EIS.